



Aquaculture
Stewardship
Council

ASC Responsible Feed Standard

Initial Draft - published for Public Consultation Period 1

Consultation Period Dates & Contact	
Public Consultation Period	1 (of 2)
• Start date:	Tuesday 30 June
• Closing date:	Friday 11 September 2015
Feedback form	See "Feedback form" document (excel)
Submitting feedback form	standards@asc-aqua.org
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--- READING INSTRUCTION ---

This is the initial draft of the ASC Responsible Feed Standard, which is open for Public Consultation from 30 June until 11 September 2015.

Collectively, the requirements in the Standard seek to minimise or eliminate the key negative environmental and social impacts of the production of the main ingredients used in aquaculture feed, while permitting the industry to remain financially viable.

The requirements are intended to be a starting point. They hope to encourage continuous improvement. They will be updated periodically to reflect the best available scientific knowledge, management practices and technologies and the data collected during the certification of feed mills to the requirements. The Standard calls for a high level of transparency around feed mill level data and monitoring to assist in future revisions.

The Standard is intended to be a tool to improve the sustainability of the industry. The Steering Committee recognises that feed mill level standards must be complemented by effective governmental regulations.

This document contains the following chapters:

- **Introduction**
Covers the mission and vision of the Aquaculture Stewardship Council as well as an introduction to the ASC Responsible Feed Standard.
- **Part A: Purpose, scope and considerations**
Covers the purpose and scope of the ASC Responsible Feed Standard and considerations that were taken into account during the development of this initial draft.
- **Part B: Standard development process**
Covers the description of the development process and the standard structure.
- **Part C: Specific issues and challenges for which stakeholder feedback is requested**
Covers items that the Steering Committee would like stakeholders to give special attention to and provide an input on.
- **Part D: Initial Draft ASC Responsible Feed Standard**
Covers the initial draft of the ASC Responsible Feed Standard.

NOTE: this entire document (Part A, B, C and D) is open for feedback.

NOTE: please use the feedback form to submit your feedback.

The Steering Committee of the ASC Responsible Feed Standard welcomes feedback on this initial draft standard from all relevant stakeholders.

If you have any questions, please contact Michiel Fransen (standards@asc-aqua.org).

Table of Content

Introduction	4
The Aquaculture Stewardship Council (ASC)	4
The ASC Responsible Feed Standard.....	4
Part A: Purpose, Scope, Structure and Considerations	6
Purpose and scope	6
Standard structure	8
Considerations of the Standard	8
Part B: Standard Development Process	9
Process and Participants	9
Part C: Specific issues and challenges for which stakeholder feedback is requested	12
Part D: Initial Draft ASC Responsible Feed Standard	14
Principle 1 – General Feed Mill Requirements	14
Principle 2 – Responsibly Source Marine Ingredients.....	29
Principle 3 – Responsibly Source Terrestrial Plant Ingredients	36
Principle 4 – Responsibly Source Terrestrial Animal Ingredients	38
Appendix 1: GHG Calculations	39
Appendix 2: Waste Definitions	40
Appendix 3: Nutrient Emissions to Water Calculations	41

Introduction

The Aquaculture Stewardship Council (ASC)

The Aquaculture Stewardship Council, is an independent not for profit organisation. The ASC was founded in 2010 by the WWF (World Wildlife Fund)Worldwide Fund for Nature and IDH (The Sustainable Trade Initiative) to manage global Standards for responsible aquaculture. ASC's Farm Standards were first developed by the Aquaculture Dialogues, a series of roundtables initiated and coordinated by the WWF.

What the ASC is

The ASC's aquaculture certification programme and logo recognise and reward responsible aquaculture. The ASC is a global organisation working internationally with aquaculture producers, seafood processors, retail and foodservice companies, scientists, conservation groups, social NGO's and the public to promote the best environmental and social practices in aquaculture.

What the ASC does

Working with partners, the ASC runs a programme to transform the world's aquaculture markets by promoting the best environmental and social aquaculture performance. The ASC seeks to increase the availability of aquaculture products certified as responsibly produced. The ASC's credible consumer logo provides third party assurance of conformity with production and chain of custody standards and makes it easy for everyone to choose ASC certified products.

What the ASC will achieve

The ASC is transforming aquaculture practices globally through:

- **Credibility:** Standards developed according to ISEAL guidelines, multi-stakeholder, open and transparent, science-based performance metrics.
- **Effectiveness:** Minimising the environmental and social footprint of commercial aquaculture by addressing key impacts.
- **Added value:** Connecting the farm to the marketplace by promoting responsible practices through a consumer logo.

The ASC Responsible Feed Standard

Seafood accounts for nearly 20% of the global intake of animal protein. By volume, close to half of the seafood we eat is farmed, while the remainder comes from the wild. Aquaculture's contribution is expected to continue to rise while the wild-caught supply is expected to remain stable, as fisheries have reached their maximum production limits.

As with any rapidly growing industry, there are global concerns regarding aquaculture production. Specifically, they include the possible impacts commonly associated with aquaculture such as water pollution, the enhancement and spread of disease, escapes outcompeting native species, habitat degradation, and social impacts on local communities.

Within the aquaculture industry, some operators are better than others at mitigating these negative environmental and social impacts. It is important that we face the challenge of identifying the key

areas where production can be improved. These changes could reduce or, ultimately, eliminate negative impacts. For such an undertaking to be successful it is important to develop market mechanisms to reward and help finance the improvements.

One solution is the creation of a set of requirements (i.e. a standard) for responsible aquaculture products that reward best practices. Certification requirements for social and environmental responsibility, when they are adopted and compliance is verified appropriately, can help reassure retailers and consumers that the impacts related to aquaculture are minimised and mitigated to acceptable levels.

Formulated feeds are an important component of the farming process for a number of key aquaculture species. Interest in the responsible use of aquafeeds is broader than managing the impacts of feed use in the farming system alone (e.g. controlling pollution from excessive use) and extends to questions about the environmental and social impact created by the production systems used to produce the various ingredients.

A wide variety of plant, animal and other Ingredients are currently used in formulated feeds with the dominant categories being various plant derived products (e.g. soy, wheat, rice, corn), fishmeal and oil and meat by-products. In addition to these main ingredient categories there are smaller quantities of additives used such as additional nutrients, pharmaceuticals and probiotics, amongst others.

The raw material production creates both environmental and social issues, at both the raw material production and processing points of the supply chain. These can include habitat loss, overharvesting, loss of threatened species, pollution and exploitation of workers, amongst others.

The purpose of the ASC Responsible Feed Standard is to provide a means to reduce the environmental and social impact created by the production of raw materials used for aquaculture feed significantly.

The ASC Responsible Feed Standard will eventually replace the feed ingredient requirements within individual, species-specific ASC Farm Standards. ASC certified farms will eventually need to use ASC certified feed in order to be certifiable.

Part A: Purpose, Scope, Structure and Considerations

Purpose and scope

Purpose

The purpose of the ASC Responsible Feed Standard is to provide a means to significantly reduce the environmental and social impacts created by the production of ingredients used for aquaculture feed.

Furthermore, the standard also aims to provide an incentive and workable goals for ingredient producers that want to improve their production processes.

Scope

- Geographic scope to which the Standard applies
The ASC Responsible Feed Standard will apply to all locations and scales of aquaculture feed manufacturing plants globally, although it is most likely that the Standard will initially be of interest to those who produce commercial extruded diets destined for ASC certified aquaculture farms.
- Unit of certification to which the Standard applies
The unit of certification for the ASC Responsible Feed Standard is the feed mill.
- Scope of ingredients - overview
Over the past 1.5 years the Steering Committee has considered a wide variety of issues that could affect the practicality and robustness of the feed standard.

It took note of:

- the expected leverage that the aquaculture feed industry will have on the production of specific ingredients
- the expected leverage that this standard will have on the production of specific ingredients
- the environmental and social issues generated by the production of feed ingredients
- existing sustainability initiatives
- supply chain realities
- aspiration of the Steering Committee to make improvements where possible.

The following table sets out the results of the Committee's deliberations:

Varying scopes within standard					
Section of Standard:	Ingredient groups:	Scope:	Issues addressed :	Available tools:	Not addressed issues:
Section I: General Feed Mill Requirements <i>(Principle 1)</i>	-	<ul style="list-style-type: none"> Processing level 	<ul style="list-style-type: none"> Licenses to operate Manufacturing process Labour practices Sourcing Product impact Local community engagement 	-	
Section II: Ingredient Sourcing Requirements <i>(Principle 2,3 and 4)</i>	Ingredients derived from marine animal sources	<ul style="list-style-type: none"> Production level Processing level 	<ul style="list-style-type: none"> Environmental accountability (production level (fishery)): <ul style="list-style-type: none"> Use of whole/by-products fish for feed Prevention of IUU and destructive fishing Social accountability (production level (fishery)) Factory traceability (processing level) 	<ul style="list-style-type: none"> Fisheries improvement methodologies available Fishery certification possible Factory certification possible 	<ul style="list-style-type: none"> Local food security
	Ingredients derived from terrestrial plant sources	<ul style="list-style-type: none"> Production level (for ingredients with certification schemes + Chain of Custody available) Processing level 	<ul style="list-style-type: none"> Environmental & social accountability for certified ingredients Risk-assessment criteria for non-certified ingredients 	<ul style="list-style-type: none"> Certification schemes available for soybean and oil palm derived ingredients 	<ul style="list-style-type: none"> Local food security
	Ingredients derived from terrestrial animal sources	<ul style="list-style-type: none"> Processing level 	<ul style="list-style-type: none"> Risk-assessment criteria 	<i>Unknown to Steering Committee (!)</i>	

Standard structure

The Responsible Feed Dialogue identified the major social and environmental impacts created by the production of raw materials used in aquaculture feed. For each impact a set of principles, multiple criteria and indicators was identified. For each Indicator a set of performance-based requirements was worked out, which defines the acceptable levels to ensure mitigation of the impact. All of these variables were combined to make up the ASC Responsible Feed Standard. The various parts of the Standard are defined below:

	Definition
<i>Impact</i>	The potential problem to be addressed
<i>Principle</i>	The high-level goal for addressing the impact
<i>Criteria</i>	The area on which to focus to address the impact
<i>Indicator</i>	What to measure to determine the extent of the impact
<i>Requirement</i>	The specific metric to ensure sufficient mitigation of the negative impact

Considerations of the Standard

- Key phrases that describe what the Steering Committee wants the Standard to be are: aspirational, reward purchasers, achievable, able to service a growing industry, simple, provide reassurance to the value chain, set a positive example, will include fish feed factories' requirements, generate trust and transparency, provide stepwise mechanisms to achieve the standard, should not reinvent the wheel, and be transformational.
- The standard is flexible in that additional ingredients can be added in the future. These may be existing ingredients that are added because suitable standards are created or their materiality changes or they may be new ingredients that become more widespread (e.g.: insect meals).
- The addition of new standards, for existing or new ingredients is a key component of the feed standard as it increases availability and flexibility. At this stage the process for evaluating the suitability of new standards has not been determined and comments are welcome.
- The Standard should not restrict the use of ingredients but only set requirements for ingredients that are described.
- It was agreed that the general policy in the ASC Standards on the inclusion of GM products should be followed. The policy does not adopt a prescriptive stance on whether GM products should be allowed or not but is clear that transparency on their inclusion is vital. If buyers wish to exclude fish fed on GM ingredients the information provided should allow such a decision to be taken.

Part B: Standard Development Process

Process and Participants

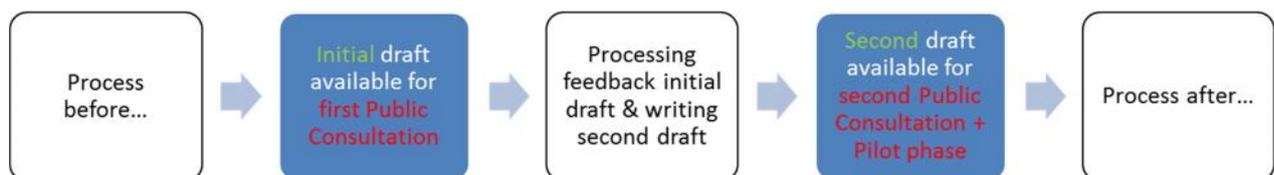
Process

The ASC Responsible Feed Project is a transparent, multi-stakeholder project aiming for consensus-oriented discussions.

The development process involved both in-person and teleconference meetings of both the Steering Committee and the individual Technical Working Groups. The Steering committee had at least two in-person meetings and two teleconference meetings per year. All Technical Working Groups met in-person in September 2014, followed by several individual group in-person meetings and/or teleconference meetings.

Drafting the requirements was based on expertise within the SC and TWG's and the expertise of outside experts as needed. The SC remains the final decision-making body.

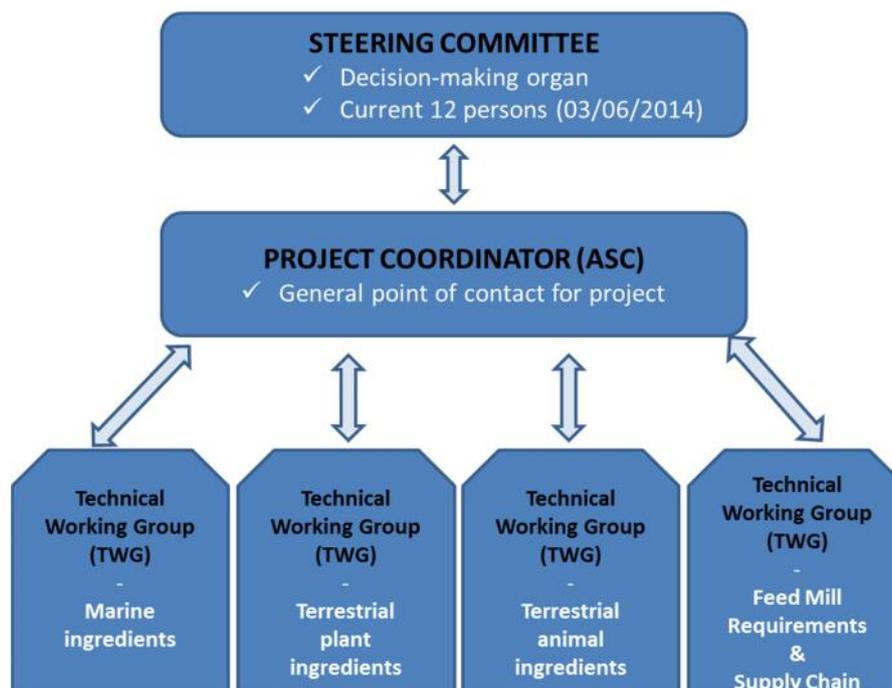
The draft version of the ASC Responsible Feed Standard will be available for two rounds of public consultation, and one pilot testing period, as presented in the figure below:



For further details on the process, please see [Terms of Reference](#) for this project.

Governance and Participants

Project governance



Stakeholder identification

In order to have a balanced multi-stakeholder representation, the following primary stakeholders were identified:

- Feed Producers
- Raw material producers and suppliers
- Aquaculture producers
- Non-governmental organisations (environmental and social)
- Retail
- Scientists
- Other standard-setting organizations

Stakeholders were encouraged to participate in the project through a range of channels: personal contact, e-mail & telephone, newsletters, social media and the ASC website.

Project participants

Stakeholders participated directly in two governance bodies for the Responsible Feed Standard project:

1. The Steering Committee
2. The Technical Working Groups

The Steering Committee is a multi-stakeholder group responsible for managing the Responsible Feed Standard process. The 13 people involved in the SC, represent 10 votes.

Current (June 2015) Steering Committee members are:

	Name:	Stakeholder:	SC-member since:	Vote:
1	Albert Tacon	Non-Industry	October 2014	1
2	Ally Dingwall	Industry	October 2013	1
3	Andrew Jackson	Industry	October 2013	1
4	Blake Lee-Harwood (Chair)	Non-Industry	October 2013	1
5	Eduardo Goycoolea	Industry	October 2013	1 (combined vote)
6	Tor Eirik Homme			
7	Johan Verburg	Non-Industry	May 2014	1
8	Karl Tore Maeland	Industry	October 2013	1 (combined vote)
9	Niels Alsted			
10	Trygve Berg Lea			
11	Michael Tlusty	Non-Industry	October 2013	1
12	Piers Hart	Non-Industry	October 2013	1
13	Yaowaluck Jirawangso	Industry	February 2015	1
-	Duncan Leadbitter	Consultant	October 2013	-

Resigned (May 2015) Steering Committee members are:

	Name:	Stakeholder:	SC-member period:	Vote:
1	Daniel Fegan	Industry	October 2013 – April 2015	1
2	Michael Philips	Non-Industry	October 2013 – April 2015	1

To advise and guide the Steering Committee, four Technical Working Groups were established, three focussing on one of the main raw material categories (Marine Ingredients, Terrestrial Plant Ingredients and Terrestrial Animal Ingredients) and one on the General Mill Requirements. In total close to 60 people participated in the TWGs.

The process sought to have balanced representation on both the SC and the TWGs from industry and non-industry members. Despite continuous efforts, non-industry participation in TWG-Terrestrial Animal Ingredients and TWG-General Feed Mill Requirements was less than 50 per cent of the total votes within these TWGs.

Although the Steering Committee and Secretary reached out to several under-represented stakeholder groups, active involvement of these under-represented stakeholder groups remains a problem.

Under represented stakeholder groups are: producers of raw material (both marine raw materials and terrestrial raw materials).

Part C: Specific issues and challenges for which stakeholder feedback is requested

The development of the feed standard has presented some significant and unusual challenges for the Steering Committee. All stakeholders are encouraged to provide input on the issues mentioned below.

- I. **In Principle 2 and 3 of the Initial Draft, under various criteria, “XX percentage” is written. This is a deliberate choice of the Steering Committee and aims to indicate the development direction of the standard.**

REQUEST I: the Steering Committee encourages all relevant stakeholders to provide their feedback on the level of these percentages, and their rationale behind this.

- II. **The diverse nature of the ingredients in feed, with several hundred different varieties being recorded across the world, reflecting the wide variety of species under cultivation and the diversity of locally available ingredients, especially plants.**

REQUEST II: given the variety of ingredients and their (potential) environmental and social impacts across the world, what would be the best approach to address this broad variety of ingredients?

- III. **Feed is a manufactured product, but many concerns relate to the production of the raw materials. The ingredients may pass through a number of hands before reaching the feed mill, which creates traceability challenges and raises questions about how far one should go back into the supply chain.**

REQUEST III: given the complexity of supply chains and the costs of developing and enforcing rigorous traceability systems’ how can there be a credible system put in place that ensures responsible supply claims are valid without creating a disproportionate burden for industry (and particularly small and developing country producers)?

- IV. **The fact that ASC standards rely on materials certified to other standards presents a potential risk if these other standards are changed.**

REQUEST IV: should the Feed Standard have its own baseline criteria that are used to set ‘must have’ requirements for ingredients, irrespective of whether they are subject to certification to another standard or not?

- V. **How to enable sufficient certified material to be made available to grow the market without having the standard so low as to be meaningless. This is not an uncommon issue but is made all the more complicated by the variety of ingredients.**

REQUEST V: should producers of ingredients be able to supply material for use under the ASC feed standard if they are prepared to commit to achieving an appropriate level of certification in the longer term and can provide verified evidence of progress towards certification.?

- VI. **Coupled with these issues are the common concerns of stakeholders (industry and NGOs) about audit fatigue, costs, the need for as much harmonisation between similar standards as possible (to control costs) and the differential impacts on developing world producers.**

REQUEST VI: The Committee has discussed a number of solutions such as:

- focusing on several of the higher volume ingredients in the first instance
- making use of existing standards such that volumes of certified feed should be able to grow relatively quickly
- making use of ‘mass balance’ approaches for bulk products rather than having separate production systems for certified versus non-certified produce

- creating an 'entry-level' option for materials that have yet to achieve a level of sustainability performance through structured improvement projects
- establishing a process for ASC whereby other ingredients standards that meet the requirements of the feed standard can be evaluated and recognised. During research for the feed standard a large number of country level and regional standards for plant materials were found and some producers may wish to use these. They will need to provide evidence to the ASC for these standards to be recognised.

Part D: Initial Draft ASC Responsible Feed Standard

Principle 1 – General Feed Mill Requirements

The purpose of the following control points is to ensure that feed manufacturers conduct their business in a legal, fair and equitable manner.

CRITERION 1.1 LICENSE TO OPERATE

INDICATOR	STANDARD
1.1.1 Systematic review of relevant laws and regulations undertaken.	Annually.
1.1.2 Full compliance with all relevant local, regional and national laws regarding operation of the feed mill including possession of necessary legal permits.	Yes.
1.1.3 Presence of database to record non-compliances and actions taken to address the associated issues.	Yes.

Rationale:

The laws and regulations set by relevant authorities provide the minimum social and environmental conditions that must be met by a responsible business operation.

Additional information:

Feed mills must comply with a set of laws from a combination of local, regional, national authorities. These can vary significantly depending on the location of the mill but any responsible operation will be able to establish all of the necessary legal requirements, assess compliance and then take appropriate actions to ensure any issues are addressed.

Synergies with other standards:

- GLOBALG.A.P Compound Feed Manufacturing Standard
- BAP Feed Mill Standard

CRITERION 1.2 ANTI-CORRUPTION

INDICATOR	STANDARD
1.2.1 Presence of functioning policy which states the company approach to anti-corruption.	Yes.
1.2.2 Evidence that policy is communicated to all employees.	Yes.
1.2.3 Percentage of senior management ¹ , legal/regulatory, sales and procurement staff trained in anti-corruption.	100%.

¹ Senior management is defined as.....

1.2.4 Number of staff convicted of corruption charges in previous 12 months.	None.
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Rationale:

In order to promote a fair and competitive economy it is essential that feed mills engage in ethical conduct with organizations such as suppliers, contractors, competitors and governments with whom they interact. This involves respecting the rule of the law and adhering to ethical standards with the intention to establish legitimate and productive relationships.

Synergies with other standards:

- ISO26000 Social Responsibility

CRITERION 1.3 MANUFACTURING PROCESS

The purpose of the following criteria is to ensure that feed manufacturers understand the environmental impacts of their operations and take appropriate action to mitigate any associated negative outcomes.

CRITERION 1.3.1 Energy

INDICATOR	STANDARD
1.3.1.1 Presence of annual calculation of energy used in the manufacturing process (by source).	Measured in kJ/mt feed/year.
1.3.1.2 Presence of action plans to improve energy efficiency.	Produced annually.
1.3.1.3 Evidence that actions in the energy efficiency plan are implemented.	Yes.

Rationale:

The industrial energy used in the production of aquafeeds is not only a source of economic costs, it may also use finite natural resources that emit pollutants such as greenhouse gases (GHG). Therefore it is important that energy is used as efficiently as possible to minimize the associated economic and environmental costs. The use of alternative sources to fossil fuels should also be encouraged.

Additional information:

Different fuels have different implications for the environment both through their extraction and use as a fuel source. Therefore it is important to have the results broken down into specific energy sources, including the share of renewable energy in the mix.

Synergies with other standards:

- ISO 50001 Energy Management
- GRI Sustainability Reporting

CRITERION 1.3.2 Emissions

INDICATOR	STANDARD
1.3.2.1 Presence of annual calculation of GHG created in the manufacturing process (scope 1 and 2), as outlined in Appendix 1.	Measured in kg CO ₂ eq/mt feed/year.
1.3.2.2 Presence of action plans to reduce CO ₂ emissions intensity of operations and evidence of implementation.	Produced annually.
1.3.2.3 Evidence that actions in the emissions reduction plan are implemented.	Yes.

Rationale:

There is growing scientific consensus that the global climate is changing and that this is closely related to the rising levels of greenhouse gas (GHG) emissions coming from human activities. The most significant source is fossil fuel combustion and industrial processes which according to the United Nations contribute to almost 80 % of the total anthropogenic GHG. Feed mills should play their role in climate change mitigation by measuring the GHG emissions from their direct operations and engaging in activities to reduce this.

Synergies with other standards:

- Global Compact
- GRI Sustainability Reporting

CRITERION 1.3.3 Water consumption

INDICATOR	STANDARD
1.3.3.1 Presence of annual calculation of water used in the manufacturing process (by source).	Measured in ML/mt feed/year.
1.3.3.2 Presence of annual action plans to improve water efficiency.	Annual.
1.3.3.3 Evidence that actions in the water efficiency plan are implemented.	Yes.

Rationale:

Demand for fresh water is increasing due to a range of factors including population growth, urbanization and changing supply due to climate change. As such there is growing competition for this precious resource. It is important that feed mills are aware of their water use and take action to improve the water efficiency of their production process.

Additional information:

The source of fresh water (i.e. surface water, ground water) and the local conditions (e.g. rainfall, sensitivity of ecosystems) are very important in determining whether or not the utilization of this resource is detrimental to the natural environment. As such, water use data should be reported by source.

Synergies with other standards:

- GRI Sustainability Reporting

CRITERION 1.3.4 Waste

INDICATOR	STANDARD
1.3.4.1 Evidence of waste reduction (e.g., reuse and recycling) programs and measurable reductions in waste.	Yes.
1.3.4.2 Evidence of appropriate storage and/or disposal of non-hazardous waste.	Yes.
1.3.4.3 Evidence of appropriate storage and/or disposal of hazardous waste.	Yes.
1.3.4.4 Presence of annual calculation of total volume of waste by waste type and disposal method.	Yes.
1.3.4.5 Evidence that packaging solutions are offered to customers that reduce the amount of post-sale waste and/or increase the amount that is recycled post-use.	Yes.

Rationale:

Effective waste management ensures that resources are used in an efficient manner by reducing the amount of materials thrown away unnecessarily. It also ensures that wastes containing dangerous substances are disposed of properly and do not cause harm. Feed mills should aim to reduce waste and where this is not possible, find ways to reuse or recycle it. All waste must be stored and disposed of in a safe and responsible manner, with particular care taken for wastes that contain substances known to be hazardous to people and the environment.

Synergies with other standards:

- GRI Sustainability Reporting

CRITERION 1.3.5 Effluents

INDICATOR	STANDARD
1.3.5.1 Evidence of effluent management procedures that ensure compliance with all legal requirements.	Yes.
1.3.5.2 Evidence of spill prevention and response plan.	Yes.

Rationale:

Effluents created from the production of aquafeeds can create problems for human and environmental health if not managed correctly. As such, it is important that feed mills have procedures in place that avoid such incidences from occurring. In the case where breaches do occur, they should be recorded in a non-conformity database, with appropriate actions taken to remedy the situation and prevent it from occurring again.

CRITERION 1.4 LABOUR PRACTICES

The purpose of the following criteria is to ensure that the basic rights of employees are respected and the working conditions provided are conducive to a safe and healthy workforce.

CRITERION 1.4.1 Freedom of association and collective bargaining²

INDICATOR	STANDARD
1.4.1.1 Evidence that workers have access to trade unions (if they exist) and union representative(s) chosen by themselves without managerial interference.	Yes.
1.4.1.2 Evidence that workers are free to form organizations, including unions, to advocate for and protect their rights.	Yes.
1.4.1.3 Evidence that workers are free and able to bargain collectively for their rights.	Yes.

Rationale:

Having the freedom to associate and bargain collectively is a critical right of workers because it enables them to engage over issues such as wages and other working conditions. Freedom of Association and the effective recognition of the right to collective bargaining is one of the core principles of the International Labour Organization’s (ILO) “Declaration on Fundamental Principles and Rights at Work.” The declaration was adopted in 1998 by the 86th International Labour Conference and has since been ratified by the overwhelming majority of ILO’s 183 member nation-states.

In cases where the local law restricts the right to freedom of association and collective bargaining, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Synergies with other standards:

- Supplier Ethical Data Exchange (SEDEX) Members Ethical Trade Audit (SMETA)
- Social Accounting International (SA8000)

CRITERION 1.4.2 Child labor

INDICATOR	STANDARD
1.4.2.1 Number of incidences of child ³ labor ⁴ .	None.
1.4.2.2 Percentage of young workers ⁵ that are protected ⁶ .	100%.

² Bargain collectively: A voluntary negotiation between employers and organizations of workers in order to establish the terms and conditions of employment by means of collective (written) agreements.

³ **Child:** Any person under 15 years of age. A higher age would apply if the minimum age law of an area stipulates a higher age for work or mandatory schooling.

⁴ **Child Labor:** Any work by a child younger than the age specified in the definition of a child.

⁵ **Young Worker:** Any worker between the age of child, as defined above, and under the age of 18.

⁶ **Protected:** Workers between 15 and 18 years of age will not be exposed to hazardous health and safety conditions; working hours shall not interfere with their education and the combined daily transportation time, school time and work time shall not exceed 10 hours.

Rationale:

Children are particularly vulnerable to economic exploitation, due to their inherent age-related limitations in physical development, knowledge and experience. Children and youth need adequate time for education, development and play. Therefore, they should not have to work or be exposed to working hours and conditions that are hazardous^{7, 8} to their physical or mental well-being. The effective abolition of child labor is one of the core principles of the ILO “Declaration on Fundamental Principles and Rights at Work.” Adherence to the child labor codes and definitions included in this section indicates compliance with what the ILO and international conventions generally recognize as the key areas for the protection of child and young workers.

Additional Information:

Minimum age of permanent workers is usually 15 years old, or 14 if the country allows it under the developing country exceptions in ILO convention 138. If the legal minimum age allowed in the country is higher than 15 years, the legal minimum age of the country is followed.

Synergies with other standards:

- Supplier Ethical Data Exchange (SEDEX) Members Ethical Trade Audit (SMETA)
- Social Accounting International (SA8000)

CRITERION 1.4.3 Forced, bonded or compulsory labor

INDICATOR	STANDARD
1.4.3.1 Number of incidences of forced ⁹ , bonded ¹⁰ or compulsory labor.	None.

Rationale:

Forced labor - such as slavery, debt bondage and human trafficking - is a serious concern in many industries and regions of the world. The elimination of all forms of forced or compulsory labor is one of the core principles of the ILO “Declaration on Fundamental Principles and Rights at Work.” Ensuring that contracts are clearly articulated and understood by workers is critical to determining that labor is not forced. The inability of a worker to freely leave the workplace and/ or an employer withholding original identity documents of workers are indicators that employment may not be at-will. Adherence to these policies shall indicate feed mill is not using forced, bonded or compulsory labor forces.

Synergies with other standards:

- Supplier Ethical Data Exchange (SEDEX) Members Ethical Trade Audit (SMETA)
- Social Accounting International (SA8000)

⁷ **Hazard:** The inherent potential to cause injury or damage to a person’s health (e.g., unequipped to handle heavy machinery safely, and unprotected exposure to harmful chemicals).

⁸ **Hazardous work:** Work that, by its nature or circumstances in which it is carried out, is likely to harm the health, safety or morals of workers. (e.g., heavy lifting disproportionate to a person’s body size, operating heavy machinery, exposure to toxic chemicals)

⁹ **Forced (Compulsory) labor:** All work or service that is extracted from any person under the menace of any penalty for which a person has not offered him/ herself voluntarily or for which such work or service is demanded as a repayment of debt. “Penalty” can imply monetary sanctions, physical punishment, or the loss of rights and privileges or restriction of movement (e.g., withholding of identity documents).

¹⁰ **Bonded labor:** When a person is forced by the employer or creditor to work to repay a financial debt to the crediting agency.

CRITERION 1.4.4 Discrimination¹¹

INDICATOR	STANDARD
1.4.4.1 Evidence of comprehensive ¹² and proactive anti-discrimination policies and practices.	Yes.
1.4.4.2 Number of incidences of discrimination.	None.

Rationale:

The elimination of discrimination in respect of employment and occupation is one of the core principles of the ILO “Declaration on Fundamental Principles and Rights at Work.” Unequal treatment of workers based on certain characteristics related to race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or any other condition that may give rise to discrimination, is a violation of a workers’ human rights. Additionally, widespread discrimination in the working environment can negatively affect overall poverty and economic development rates.

Feed mills must demonstrate their commitment to equality with an official anti-discrimination policy, a policy of equal pay for equal work, as well as clearly outlined procedures to raise, file and respond to a discrimination complaint in an effective manner.

Additional Information:

“Positive” discrimination (i.e., special treatment to protect the rights and health of particular groups of workers, or to provide opportunities for groups which have historically been disadvantaged) is allowed, and often required by laws related to such issues as maternity and affirmative action.

Synergies with other standards:

- Supplier Ethical Data Exchange (SEDEX) Members Ethical Trade Audit (SMETA)
- Social Accounting International (SA800)

CRITERION 1.4.5 Work environment health and safety

INDICATOR	STANDARD
1.4.5.1 Presence of a health and safety risk assessment and evidence of preventive actions taken.	Yes.
1.4.5.2 Percentage of workers trained in health and safety practices, procedures and policies on a yearly basis.	100%.
1.4.5.3 Evidence that workers use Personal Protective Equipment (PPE) effectively.	Yes.
1.4.5.4 Evidence that all health and safety related accidents and violations are recorded and corrective actions are taken when necessary.	Yes.

¹¹ **Discrimination:** Any distinction, exclusion, or preferences, which has the effect of nullifying or impairing equality of opportunity or treatment. Not all distinction, exclusion, or preference constitutes discrimination. For instance, a merit- or performance-based pay increase or bonus is not by itself discriminatory. Positive discrimination in favor of people from certain underrepresented groups may be legal in some countries.

¹² Employers shall have written anti-discrimination policies stating the company does not engage or support discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, age, or any other condition that may give rise to discrimination

1.4.5.5 Evidence of employer responsibility and/or proof of insurance (accident or injury) for worker costs in a job-related accident or injury when not covered under national law.	Yes.
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Rationale:

A safe and healthy working environment is essential for protecting workers from harm. One of the key risks to workers are hazards resulting from accidents and injuries. Consistent, effective and regular worker training in health and safety practices is an important preventative measure. When an accident, injury or violation occurs, the company must record it and take corrective action to identify the root causes of the incident, remediate, and take steps to prevent future occurrences of similar incidents. This addresses violations and the long-term health and safety risks. While many national laws require that employers assume responsibility for job-related accidents and injuries, not all countries require this and not all workers (in some cases migrant and other workers) will be covered under such laws. When not covered under national law, employers must prove they are insured to cover 100% of worker costs when a job-related accident or injury occurs.

Synergies with other standards:

- Supplier Ethical Data Exchange (SEDEX) Members Ethical Trade Audit (SMETA)
- Social Accounting International (SA8000)
- GLOBALG.A.P Compound Feed Manufacturing Standard
- BAP Feed Mill Standard

CRITERION 1. 4.6 Wages

INDICATOR	STANDARD
1.4.6.1 The percentage of workers whose basic wage ¹³ (before overtime and bonuses) is below the national minimum wage ¹⁴ .	0 (None).
1.4.6.2 Evidence that the employer is working towards the payment of basic needs wage ¹⁵ .	Yes.
1.4.6.3 Evidence of transparency in wage-setting.	Yes.

Rationale:

Wages and the process for setting wages are important components of the ILO core principles. For this reason, it is important to highlight under these standards the importance of workers’ basic wages meeting the legal minimum wage and being rendered to workers in a convenient manner. Unfortunately, minimum wage in many countries does not always cover the basic needs of workers. Unfairly and insufficiently compensated workers can be subject to a life of sustained poverty. Therefore, it is important for socially responsible employers to pay or be working towards paying a basic needs wage. The calculation of a basic needs wage can be complex and it is important for employers to consult with workers, their representatives and other credible sources when assessing what a basic needs wage would be.

¹³ **Basic wage:** the wages paid for a standard working week (no more than 48 hours)

¹⁴ If there is no legal minimum wage in a country, basic wages must meet the industry-standard minimum wage.

¹⁵ **Basic needs wage:** A wage that covers the basic needs of an individual or family, including housing, food, and transport. This concept differs from a minimum wage, which is set by law and may or may not cover the basic needs of workers.

Certified feed mills shall also demonstrate their commitment to fair and equitable wages by having and sharing a clear and transparent mechanism for wage-setting and a labor conflict resolution policy¹⁶ that tracks wage-related complaints and responses. Having these policies outlined in a clear and transparent manner will empower the workers to negotiate effectively for fair and equitable wages that shall, at a minimum, satisfy basic needs.

Synergies with other standards:

- Supplier Ethical Data Exchange (SEDEX) Members Ethical Trade Audit (SMETA)
- Social Accounting International (SA8000)

CRITERION 1.4.7 Contracts (labor) including subcontracting

INDICATOR	STANDARD
1.4.7.1 Percentage of workers who have contracts ¹⁷ .	100%.
1.4.7.2 Evidence of a policy to ensure that social conditions of staff belonging to suppliers and contractors are equivalent to those enjoyed by staff employed by feed mill owner.	Yes.

Rationale:

Fair contracting is important to ensure transparency between the employer and employee and fairness in the employment relation. Short-term and temporary contracts are acceptable but cannot be used to avoid paying benefits or to deny other rights. The company shall also have policies and mechanisms to ensure that workers contracted from other companies for specific services (e.g., divers, cleaning or maintenance) and the companies providing them with primary inputs or supplies have socially responsible practices and policies.

Synergies with other standards:

- Supplier Ethical Data Exchange (SEDEX) Members Ethical Trade Audit (SMETA)
- Social Accounting International (SA800)

CRITERION 1.4.8 Conflict resolution

INDICATOR	STANDARD
1.4.8.1 Evidence of worker access to effective, fair and confidential grievance procedures.	Yes.
1.4.8.2 Percentage of grievances handled that are addressed ¹⁸ within a 90 day timeframe.	100%.

¹⁶ See Criterion 3.8.

¹⁷ Labor-only contracting relationships or false apprenticeship schemes are not acceptable. This includes revolving/ consecutive labor contracts to deny benefit accrual or equitable remuneration. **False Apprenticeship Scheme:** The practice of hiring workers under apprenticeship terms without stipulating terms of the apprenticeship or wages under contract. It is a “false” apprenticeship if its purpose is to underpay people, avoid legal obligations, or employ underage workers. **Labor-only contracting arrangement:** The practice of hiring workers without establishing a formal employment relationship for the purpose of avoiding payment of regular wages or the provision of legally required benefits, such as health and safety protections

¹⁸ **Addressed:** acknowledged and received, moving through the company’s process for grievances, corrective action taken when necessary.

Rationale:

Companies must have a clear labor conflict resolution policy in place for the presentation, treatment and resolution of worker grievances in a confidential manner. Workers shall be familiar with the policy and its effective use. Such a policy is necessary to track conflicts and complaints raised, as well responses to conflicts and complaints.

Synergies with other standards:

- Supplier Ethical Data Exchange (SEDEX) Members Ethical Trade Audit (SMETA)
- Social Accounting International (SA8000)

CRITERION 1.4.9 Disciplinary practices

INDICATOR	STANDARD
1.4.9.1 Incidences of excessive or abusive disciplinary actions.	None.
1.4.9.2 Evidence of a functioning disciplinary action policy whose aim is to improve the worker.	Yes.

Rationale:

The rationale for discipline in the workplace is to correct improper actions and maintain effective levels of worker conduct and performance. However, abusive disciplinary actions can violate workers' human rights. The focus of disciplinary practices shall always be on the improvement of the worker. Fines or basic wage deductions shall not be acceptable as methods for disciplining workforce. A certified feed mill shall never employ threatening, humiliating or punishing disciplinary practices that negatively impact a worker's physical and mental¹⁹ health or dignity.

Additional Information:

If disciplinary action is required, progressive verbal and written warnings shall be engaged. The aim shall always be to improve the worker; dismissal shall be the last resort. Policies for bonuses, incentives, access to training and promotions are clearly stated and understood, and not used arbitrarily. Fines or basic wage deductions shall not be acceptable disciplinary practices.

Synergies with other standards:

- Supplier Ethical Data Exchange (SEDEX) Members Ethical Trade Audit (SMETA)
- Social Accounting International (SA8000)

CRITERION 1.4.10 Working hours and overtime

INDICATOR	STANDARD
1.4.10.1 Incidences, violations or abuse of working hours ²⁰ and overtime laws.	None.
1.4.10.2 Overtime is limited, voluntary ²¹ , paid at a premium rate and restricted to exceptional circumstances.	Yes.

¹⁹ **Mental Abuse:** Characterized by the intentional use of power, including verbal abuse, isolation, sexual or racial harassment, intimidation, or threat of physical force

²⁰ In cases where local legislation on working hours and overtime exceed internationally accepted recommendations (48 regular hours, 12 hours overtime), the international standards will apply.

²¹ Compulsory overtime is permitted if previously agreed to under a collective bargaining agreement.

Rationale:

Abuse of overtime working hours is a widespread issue in many industries and regions. Workers subject to extensive overtime can suffer consequences in their work-life balance and are subject to higher fatigue-related accident rates. In accordance with better practices, workers in certified feed mills are permitted to work—within defined guidelines—beyond normal work week hours but must be compensated at premium rates²². Requirements for time-off, working hours and compensation rates as described should reduce the impacts of overtime.

Synergies with other standards:

- Supplier Ethical Data Exchange (SEDEX) Members Ethical Trade Audit (SMETA)
- Social Accounting International (SA8000)

CRITERION 1.4.11 Education and training

INDICATOR	STANDARD
1.4.11.1 Evidence that the company encourages and supports education initiatives for all workers (e.g., courses, certificates and degrees).	Yes.

Rationale:

Education and training can be beneficial to companies and enable workers to improve their incomes. Such human capital development should be encouraged where it is in the interest of the company. Incentives, such as subsidies for tuition or textbooks and time off prior to exams, should be offered. The offer of training may be contingent on workers committing to stay with the company for a pre-arranged time. This should be made clear to participants before they start the training.

Synergies with other standards:

- Supplier Ethical Data Exchange (SEDEX) Members Ethical Trade Audit (SMETA)
- Social Accounting International (SA8000)

CRITERION 1.4.12 Corporate policies for social responsibility

INDICATOR	STANDARD
1.4.12.1 Demonstration of company-level ²³ policies in line with the ASC responsible feed standard.	Yes.

Rationale:

Companies must be able to demonstrate that not only are the specific sites applying for certification able to meet this robust set of social and labor standards, but that they also have company-wide policies related to these key issue areas that are in line with the Feed Dialogue standards. Such policies must relate to all of the company’s operations.

Synergies with other standards:

- Supplier Ethical Data Exchange (SEDEX) Members Ethical Trade Audit (SMETA)
- Social Accounting International (SA8000)

²² **Premium rate:** A rate of pay higher than the regular work week rate. Must comply with national laws/regulations and/or industry standards.

²³ Applies to the headquarters of the company in a region or country where the site applying for certification is located.

CRITERION 1.5 SOURCING

The purpose of these criteria is to ensure the ingredients used to make feeds are sourced from responsibly managed production systems.

CRITERION 1.5.1 Risk assessment

INDICATOR	STANDARD
1.5.1.1 Presence of written responsible sourcing policy for the purchase of feed ingredients which is made public.	Yes.
1.5.1.2 Evidence that the sourcing policy has been communicated to all staff and all suppliers.	Yes.
1.5.1.3 Presence of a risk assessment for all feed ingredients that constitute more than 1% by weight of final feed product.	Yes.
1.5.1.4 Risk assessment is made publicly available.	Yes.
1.5.1.5 Evaluation of company and supplier compliance with sourcing policy based on the risk assessment which is made public.	Yes.
1.5.1.6 Evidence that all non-compliance with the sourcing policy is being addressed via a time-limited action plan.	Yes.

Rationale:

Aquafeeds are made from a range of ingredients that are sourced from global supply chains. To ensure these materials come from responsibly managed production systems, feed mills should produce a responsible sourcing policy and undertake a systematic risk assessment of their supply chains. This must include social and environmental issues that are specific to suppliers (e.g. child labour), the location of the company (e.g. geopolitical issues), as well as the individual feed ingredients (e.g. environmental impacts of producing certain raw materials).

Synergies with other standards:

- ISO 26000 Social Responsibility
- BAP Feed Mill Standard

CRITERION 1.5.2 Traceability

INDICATOR	STANDARD
1.5.2.1 Presence of an effective traceability system that allows feed ingredients ²⁴ to be traced from the point of sale of final product back to the point of purchase of individual ingredients, including all internal traceability and handling steps.	Yes.

Rationale:

When dealing with complex global supply chains it is essential that systems are in place to enable materials to be traced back to their origin. Such a system is vital when problems arise and the

²⁴ This refers to feed ingredients for which there are not already existing requirements set for traceability (e.g. marine, soy, palm) where a greater detail of traceability is required (as noted in the relevant criteria).

affected materials need to be identified and isolated. This not only helps to protect the safety of the end consumer, but also minimizes the associated financial and reputational losses for the feed mill. Ideally materials should be traced from the feed mill back to the place where the original material was produced, but unfortunately this can be difficult to achieve in practice. In some cases this is because there is a lack of data available from key players within the supply chain, whilst in other cases it is because of the inherent nature of the production process which makes it difficult to trace (e.g. products that undergo multiple extraction and refining processes). As such, feed mills must be able to trace one step back in the supply chain and are encouraged to go further if possible.

Additional Information:

Feed mills must adhere to the stricter traceability requirements specified in criteria x, y and z which apply to high risk feed ingredients (marine, palm and soy) but it is highly encouraged that feed mills strive to achieve this level of traceability for all feed ingredients.

Synergies with other standards:

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CRITERION 1.5.3 Genetic Modification

INDICATOR	STANDARD
1.5.3.1 Presence of system to identify feeds which contain transgenic ²⁵ materials (>1% of total volume).	Yes.

Rationale:

The production and use of transgenic materials is increasing globally, with around 79% of the global supply of soy coming from transgenic sources, as well as 30% maize and 24% rapeseed²⁶. Despite the widespread use of these materials, many consumers remain sceptical of the long term impacts and wish to avoid them. As such there is a need to identify food products that are genetically modified or that have been fed genetically modified ingredients. Feed mills must therefore be aware of the any transgenic materials they receive from their suppliers and have systems in place to trace these through their production process and into the finished feeds. This is required to meet customer requests for declarations from feed companies regarding the inclusion of transgenic materials in feeds.

Synergies with other standards:

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CRITERION 1.6 PRODUCT IMPACT

CRITERION 1.6.1 Nutrient emissions to water

INDICATOR	STANDARD
1.6.1.1 Calculation has been made of the potential nitrogen and phosphorus emissions to water resulting from the use of feed on farm according to guidelines Appendix 3.	Yes.
1.6.1.2 Calculation of potential nutrient emissions to water	Yes.

²⁵ Transgenic is defined as....

²⁶ International Service for the Acquisition of Agri-Biotech Applications (2013) Brief 46: Global Status of Commercialized Biotech/GM Crops: 2013

(5.1.1) is disclosed to farms wishing to be certified according to ASC standards.	
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Rationale:

Nitrogen and phosphorus are released to waters surrounding fish pens as a result of uneaten feeds and metabolic by-products. If not managed properly, this can lead to significant changes to pelagic and benthic ecosystems. Feed companies can assist their customers to better understand the potential impacts of their feeds on the local environment by providing them with an estimate of the nutrient emissions based on nutrient content and digestibility of specific feeds.

Synergies with other standards:

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CRITERION 1.7 LOCAL COMMUNITY ENGAGEMENT

The purpose of the following criteria is to ensure the feed manufacturer plays an active role in their local community and are aware of the impacts that their production process has on its neighbours.

CRITERION 1.7.1 Community consultation

INDICATOR	STANDARD
1.7.1.1 Evidence of involvement in regular and meaningful consultation with local community representatives and organizations.	Yes.
1.7.1.2 Presence of written evaluation identifying potential impacts of direct operations on the local community.	Yes.
1.7.1.3 Evidence of efforts made to avoid, mitigate, and/or compensate for negative impacts on the local community.	Yes.
1.7.1.4 Records of community complaints and the associated corrective action taken to address their concerns.	Yes.

Rationale:

Engaging with local communities provides an opportunity to identify potential risks, impacts and conflicts before they occur. It also helps to build solid relationships that enable problems that arise to be dealt with in a civil manner. It is expected that feed mills take all necessary precautions to prevent the occurrence of negative impacts on the local community. In cases where these do occur, they must demonstrate due diligence and address the issues in an open, fair and transparent manner.

Synergies with other standards:

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CRITERION 1.8 HANDLING MATERIALS WITH SPECIFIC CLAIMS

The ASC Responsible Feed Standard accepts three different methods for handling materials which have a specific claim to responsibility or sustainability; full segregation, ‘mass balance’ and ‘book and claim’. The definitions of these models can be found at XXXXXXXXX. The purpose of these criteria is to ensure that all chain of custody models are documented and that it is defined how they can be used under this standard.

CRITERION 1.8.1 Segregation

INDICATOR	STANDARD
1.8.1.1 Presence of documentation confirming the validity of the sustainability claims made about the feed ingredients.	Yes.
1.8.1.2 Evidence that feed ingredients carrying a specific sustainability claim have been physically segregated from the same feed ingredients that do not carry the claim at the physical site. This includes any other stage under the control of the feed-mill.	Yes.
1.8.1.3 Evidence that suppliers of feed ingredients carrying a sustainability claim use a segregation chain of custody model.	Yes.

Rationale:

The standard allows for feed producers to deliver products to certified farms where feed ingredients that carry a specific sustainability claim are kept separate from other raw material that the feed mill might use. The standards above are meant to ensure that the raw materials and the subsequent products are kept separate.

CRITERION 1.8.2 Mass Balance and Book & Claim

INDICATOR	STANDARD
1.8.2.1 Presence of documentation confirming the validity of the sustainability claims made about the feed ingredients.	Yes.
1.8.2.2 Accounting system in place which balances the sales of feeds carrying a specific sustainability claim with the input of applicable feed ingredients (or credits) purchased.	Yes.
1.8.2.3 Records maintained of the purchase of feed ingredients and sales of feeds carrying a sustainability claim.	Minimum of 3 years.
1.8.2.4 Evidence that principles described in Appendix 3 have been followed.	All cases where mass balance or book and claim models are used.
1.8.2.5 Credits must be purchased via a trading platform that is recognized by ASC.	All cases where book and claim model used.

Rationale:

For certain raw materials streams segregation of different environmental origin can lead to highly increased logistical costs in the whole value chain. In such cases the application of the mass balance system and book and claim can support and stimulate responsible production in raw material streams where segregation can be cost prohibitive.

Principle 2 – Responsibly Source Marine Ingredients

In Principle 2 and 3 of the Initial Draft, under various criteria, “XX percentage” is written. This is a deliberate choice of the Steering Committee and aims to indicate the development direction of the standard.

REQUEST: The Steering Committee encourages all relevant stakeholders to provide their feedback on the level of these percentages, and their rationale behind this.

Key Definitions

- Supplier- Fishmeal and fish oil manufacturer

CRITERION 2.1 USE OF WHOLE WILD FISH FOR FEED

CRITERION 2.1.1 Fishery Management Framework Constitution is in place

INDICATOR	STANDARD
2.1.1.1 The applicant shall ensure that for all marine ingredients used in ASC diets their suppliers shall only source whole fish from a fishery that complies with; either the following fundamental clauses of the FAO Code of Conduct for Responsible fisheries 1995 as part of a fully ISO 17065 accredited certification programme, or is in a recognised fishery improvement project (FIP).	Initial compliance to this standard will mean that at least XX percentage of the raw material will come from fisheries approved under the IFFO RS standard or equivalent. The remainder will be permitted from a recognised multi-stakeholder fisheries improvement project [to be defined].
2.1.1.2 The supplier shall ensure that it only sources whole fish from a fishery that can demonstrate that it has structured Fishery Management objectives and procedures that shall promote the long-term conservation and sustainable use of the fishery resources and ecosystem.	Yes.
2.1.1.3 The supplier shall ensure that the whole fish fishery has a management framework that is concerned with the whole stock over its entire distribution and considers all fishery removals and the biology of the species, before targets for stock exploitation are set.	Suitable or proxy target and limit reference points in fisheries that are applicable must be set and take into account uncertainties relating to size and productivity of the stocks, unknown fishing mortality and the impact of fishing on the environment. Non applicable fisheries that cannot set reference points with any degree of certainty will be those species that are recognised for having a high population turnover either annually or biannually such as squid.

2.1.1.4 Where there is more than one stock management system identified for the whole fish fishery the supplier shall provide evidence that there is sufficient interaction between the relevant parties whether this is nationally or internationally to promote compatible management objectives that cover the conservation and sustainable utilisation of the fishery resource.	Yes.
2.1.1.5 The level of fishing permitted by the whole fish fishery management mechanism shall be set according to the most recently devised scientific information that is produced by an officially recognised scientific body.	Yes.

CRITERION 2.1.2 Improving Marine Ingredient Sourcing Requirements

INDICATOR	STANDARD
2.1.2.1 The applicant shall have a marine ingredient sourcing plan in place that is set in accordance with agreed time frames to ensure that an increasing proportion of the whole fish used as raw material are from fisheries certified to a standard that has been set in accordance with the ISEAL standard setting code. Such a standard should be based on a full ecosystem approach with specific provisions for the management of low trophic level species and the protection of populations of dependent predators.	After a period of 5 years from release of the standard: <ul style="list-style-type: none"> • At least XX percentage of supplied whole fish will be from MSC certified fisheries (or equivalent) • Up to XX percentage will be permitted from an approved FIP • The remainder percentage can come from fisheries approved under the IFFO RS standard (or equivalent).
2.1.2.2 The applicant shall ensure that all whole fish used as raw material are from fisheries certified to a standard that has been set in accordance with the ISEAL standard setting code. Such a standard should be based on a full ecosystem approach with specific provisions for the management of low trophic level species and the protection of populations of dependent predators.	After a period of 10 years from release of the standard: <ul style="list-style-type: none"> • XX percentage of supplied whole fish will be from MSC certified fisheries (or equivalent).

CRITERION 2.2 USE OF FISH BY-PRODUCTS FOR FEED

INDICATOR	STANDARD
2.2.1 The supplier shall ensure that all fish by-product material shall not come from a fish species that has been listed under the following categories on	None.

<p>the [IUCN Red list (www.IUCN.ORG)</p> <ul style="list-style-type: none"> • Critically Endangered • Endangered • Threatened • CITES or other listings including national laws. 	
<p>2.2.2 The supplier shall ensure that all fish by-product material shall not come from a fish species that is listed as vulnerable on the IUCN red list, unless they can provide evidence that the by product is derived from a discrete sub population of the fishery that has a fishery management plan that continually evaluates the stock relative to fishing and adjusts/controls harvests according to changes in the status of the stock, and is in compliance to the key clauses of the FAO CCRF and the stated FAO guidance documents.</p>	Yes.
<p>2.2.3 The supplier shall provide evidence that by-products derived from aquaculture operations shall not originate from mortalities that are caused by disease or accident.</p>	Yes.
<p>2.2.4 If the supplier sources directly from aquaculture farms as a source of by product raw material it shall need to provide evidence that the use of antibiotics is in line with approved animal health and welfare requirements and the waiting period is fulfilled.</p>	<p>Allowance for the use of antibiotics categorized as essential or critically important by the World Health Organization (WHO), even if authorized by the pertinent national authorities.</p> <p>-None.</p>

CRITERION 2.3 PREVENTION OF IUU AND DESTRUCTIVE FISHING METHODOLOGY

INDICATOR	STANDARD
<p>2.3.1 The supplier shall be able to provide evidence that all the raw marine ingredients either whole fish or by product, used in fishmeal and fish oil production are derived from legally operated and managed fisheries.</p>	Yes.
<p>2.3.2 The supplier shall provide evidence that they source whole fish and by product fish from fisheries that have enforceable laws and regulations that provide for sanctions in respect to their violation, (for example where vessels engage in illegal, unregulated and unreported fishing activity or are engaged in destructive fishing practices).</p>	Yes.

CRITERION 2.4**FACTORY TRACEABILITY FOR RAW MATERIAL**

INDICATOR	STANDARD
2.4.1 The supplier shall be able to demonstrate that a process is in place that can trace whole fish material back to an identified fishery (ies) and fishing vessel(s).[Records should be kept for a period of 3 years].	Yes.
2.4.2 The supplier shall be able to trace the origin of by product fishery material back to the supplying fish processor or handler by species or mix of species included in the received intake batches.	Yes.
2.4.3 The supplier shall have a system that allows every batch of fishmeal/oil produced to be traced from sale back to raw material purchase, including traceability at every stage of production and handling.	Yes.
<p>2.4.4 The supplier shall record details of each consignment of whole fish from the fishing vessel .The details shall include but not be limited to the following:</p> <ul style="list-style-type: none"> • Name of vessel, registration number, call sign, legal owner, name and address, • Proof of authorisation to engage in the specific fishing activity,099 • Date and time of discharge to facility, • Species and quantity discharged, • Location or place(s) and dates of fishing activity where catch originated, • Fishing method used. 	Yes.
<p>2.4.5 The supplier shall record details of each consignment of by product fish material. The details shall include but not limited to the following;</p> <ul style="list-style-type: none"> • Name(s) of processing plant • Date of production • Species category (e.g. Wild/Farmed) • Species • Possible source fisheries (may be more than one). 	Yes.
2.4.6 The supplier shall test the efficacy of their batch control and traceability systems through a thorough documented internal audit conducted no less than once per annum for both fishmeal and fish oil.	Yes.

2.4.7 The supplier shall conduct at least one mass balance yield exercise per year to test and record the amount of fish meal and fish oil derived from each raw material category, as well as volumes of compliant and non-compliant material.	One yield review per raw material species category.
2.4.8 The supplier shall have a procedure in place to ensure that all fish meal and fish oil derived from aquaculture raw material is kept segregated from non-aquaculture material and is clearly labelled as fishmeal and fish oil of the aquaculture species that they originate from, including circumstances where they are mixed with other raw materials both before and post processing.	Comply with EU Reg. 811/2003 or an appropriate national regulation.

CRITERION 2.5 SOCIAL ACCOUNTABILITY

INDICATOR	STANDARD
2.5.1 The supplier shall be able to provide evidence that it has a documented policy that commits them to ensuring that their fishmeal and fish oil products are manufactured in compliance to all ratified ILO conventions.	Yes.
2.5.2 The applicant shall ensure that its supplier has a social accountability policy that shall detail all the following areas: <ul style="list-style-type: none"> • No child labour to be used • No forced labour to be used • Safe and hygienic working conditions • Freedom of association, the right to collective bargaining and conflict resolution • No discrimination to sexual orientation, race, gender or disability • No harsh or inhumane treatment • Working hours to be in compliance to national legislation and each employee will have a term and conditions of employment • Receive the national minimum wage. 	Covers all requirements.
2.5.3 The supplier shall provide evidence that a full review has been conducted and documented at least annually by an independent third party, to demonstrate they are in compliance with the requirements for social accountability and that areas of non-compliance have been addressed	At least one review with an action plan.

appropriately.	
2.5.4. The supplier shall provide evidence that all raw material is sourced from vessels and/or factories that have not been indicted/prosecuted for contraventions to national and international regulations for social accountability and welfare.	None.
2.5.5 The supplier shall provide evidence that the vessels supplying whole fish are certified to a standard that is compliant with the ISEAL code for standard setting and which addresses social issues on board fishing boats.	After period of [10] years from release of the standard, supplying vessels will be certified to the standard.

CRITERION 2.6 ENVIRONMENTAL ACCOUNTABILITY

INDICATOR	STANDARD
2.6.1 The supplier shall have a documented environmental policy that covers all the following points: <ul style="list-style-type: none"> • The discharge of chemical, biological and physical effluent is in compliance with national regulations. • The discharge of odours and air emissions is in compliance with national regulations. 	Yes.
2.6.2 The supplier shall provide evidence that they comply with their environmental policy for effluent and emission discharges.	Yes.
2.6.3 The supplier shall provide evidence that a full review has been conducted and documented at least annually by an independent third party to review their environmental policy to ensure that it still meets with national regulations.	At least one review with associated action plans.
2.6.3.1 Any areas that are found to be non-compliant shall have a remedial action plan in place.	If applicable.
2.6.3.2 All action plans shall be approved by the national regulatory authorities.	If applicable.
2.6.4 The supplier shall provide evidence that all raw materials are sourced from vessels and/or factories	None.

that have not been indicted/prosecuted for contraventions to national and international regulations for environmental accountability.	
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Principle 3 – Responsibly Source Terrestrial Plant Ingredients

In Principle 2 and 3 of the Initial Draft, under various criteria, “XX percentage” is written. This is a deliberate choice of the Steering Committee and aims to indicate the development direction of the standard.

REQUEST: The Steering Committee encourages all relevant stakeholders to provide their feedback on the level of these percentages, and their rationale behind this.

CRITERION 3.1 REQUIREMENTS FOR INGREDIENTS FOR WHICH PREFERRED THIRD-PARTY CERTIFICATION SCHEMES ARE AVAILABLE

CRITERION 3.1.1 Requirements for soya or soya derived ingredients

INDICATOR	STANDARD
3.1.1.1 Percentage of soya or soya-derived ingredients in the feed that are certified by the Roundtable for Responsible Soy (RTRS), Proterra, or equivalent.	<ul style="list-style-type: none"> • XX percentage within 3 years of the publication²⁷ of the ASC Responsible Feed Standard. • XX percentage within 5 years of the publication of the ASC Responsible Feed Standard.

CRITERION 3.1.2 Requirements for palm oil or oil palm derived ingredients

INDICATOR	STANDARD
3.1.2.1 Percentage of palm oil or oil palm derived ingredients in the feed that are certified by the Roundtable for Responsible Palm Oil (RSPO) or equivalent.	<ul style="list-style-type: none"> • XX percentage within 3 years of the publication²⁸ of the ASC Responsible Feed Standard. • XX percentage within 5 years of the publication of the ASC Responsible Feed Standard..

Rationale:

Soybeans and oil palm derived ingredients form a major ingredient in aquafeed. The production of the raw material (soy beans and oil palm) knows many environmental and social concerns (e.g.: deforestation/land clearing, fertilizer use, herbicide/pesticide use, water use, native community displacement, etc.) which need to be addressed urgently. The Roundtable for Responsible Soy (RTRS), Proterra and the Roundtable for Responsible Palm Oil (RSPO) are acknowledged to be credible third-party certification schemes which also have credible chain of custody options available.

²⁷ Publication: refers to the date when the final standards and accompanying guidelines are completed and made publicly available. This definition of publication applies throughout this document.

²⁸ Publication: refers to the date when the final standards and accompanying guidelines are completed and made publicly available. This definition of publication applies throughout this document.

**CRITERION 3.2 REQUIREMENTS FOR INGREDIENTS FOR WHICH THERE ARE NO PREFERRED
THIRD-PARTY CERTIFICATION SCHEMES AVAILABLE**

INDICATOR	STANDARD
3.2.1 All parts of criterion 1.5, 'Sourcing' must be complied with.	100%.

Rationale:

The vast majority of all terrestrial plant derived ingredients have no sustainability initiatives available while there are major environmental and social concerns. Resulting from this lack of initiatives, traceability via chain of custody becomes impossible for the feed mill to conduct.

The Steering Committee is fully aware of the impacts of agriculture, but also realizes that with the current lack of initiatives and traceability possibilities, putting high-level indicators becomes unrealistic. It therefore proposes that mills conduct a risk assessment on their ingredients and that supplier codes are being implemented.

Principle 4 – Responsibly Source Terrestrial Animal Ingredients

There is a big potential for ingredients derived from rendered terrestrial animals to be used in aqua feed. For this reason, the Steering Committee mandated a Technical Working Group on Terrestrial Animal Ingredients.

This group consisted of 4 industry participants and 4 non-industry participants.

The group concluded that:

- Products derived from animal rendering suitable for inclusion in aquaculture feed are currently regulated under national and/or regional food safety requirements.
- There are no environmental and/or social certification schemes known to either the Technical Working Group or the Steering Committee.

Maintaining traceability of animal products prior to rendering is extremely difficult because of the mixing of by products such as blood, feathers etc. Consequently it seems impossible to maintain traceability back to the animal production facility for by-products and so difficult to set environmental or social conditions.

The Steering Committee is at this stage minded to require good social and environmental practices at the rendering plant itself (comparable to marine ingredients) but to defer any further conditions until a practical solution becomes available. All animal ingredients will still be subject to a risk assessment under the terms of this standard.

The Steering Committee encourages all relevant stakeholders to contribute solutions to this complex matter.

CRITERION 4.1 REQUIREMENTS FOR TERRESTRIAL ANIMAL INGREDIENTS

INDICATOR	STANDARD
4.1.1 All parts of criterion 1.5, 'Sourcing' must be complied with.	100%.

Appendix 1: GHG Calculations

Assessments shall follow either the GHG Protocol Corporate Standard or ISO 14064-1 (references below). These are commonly accepted international requirements, and are largely consistent with one another. Both are also high level enough not to be prescriptive and they allow companies some flexibility in determining the best approach for calculating emissions for their operations.

If a company wants to go beyond the requirement of the ASC Feed Standard and conduct this assessment for their entire company, then the full protocols are applicable. If the assessment is being done only on sites that are being certified, the feed mill shall follow the GHG Protocol Corporate Standard and/or ISO 14064-1 requirements pertaining to:

- Accounting principles of relevance, completeness, transparency, consistency and accuracy
- Setting operational boundaries
- Tracking emissions over time
- Reporting GHG emissions

In regard to the operational boundaries, feed mills shall include in the assessment:

- Scope 1 emissions come directly from a source that is either owned or controlled by the feed mill. For example, if the feed mill has a diesel generator, this will generate Scope 1 emissions. So will a truck owned/operated by the feed mill.
- Scope 2 emissions result from the generation of purchased electricity, heating, or cooling.

Quantification of emissions is done by multiplying activity data (e.g., quantity of fuel or kwh) by an emission factor (e.g., CO₂/kwh). For non-CO₂ gases, this needs to be multiplied by a Global Warming Potential (GWP) to convert non-CO₂ gases into the CO₂-equivalent. Neither the GHG Protocol nor the ISO require specific approaches to quantifying emissions, so the ASC provides the following additional information on the quantification of emissions:

- Feed mills shall clearly document the emission factors they use and the source of the emission factors. Recommended sources include the Intergovernmental Panel on Climate Change (IPCC) or factors provided by national government agencies such as the United States Environmental Protection Agency (USEPA). Companies shall survey available emission factors and select the one that is most accurate for their situation, and transparently report their selection.
- Feed mills shall clearly document the GWPs that they use and the source of those GWPs. Recommended sources include the IPCC 2nd Assessment Report, on which the Kyoto Protocol and related policies are based, or more recent Assessment Reports.

References (relevant at time of publication of standard):

- GHG Protocol Corporate Standard Website:
<http://www.ghgprotocol.org/standards/corporate-standard>
- GHG Protocol Corporate Standard Document:
<http://www.ghgprotocol.org/files/ghgp/public/ghg-protocol-revised.pdf>
- ISO 14064-1 available for download (with fee) at
http://www.iso.org/iso/catalogue_detail?csnumber=38381
- Some information on ISO 14064-1 is at
<http://www.iso.org/iso/pressrelease.htm?refid=Ref994>
- IPCC 2nd Assessment Report: <http://www.ipcc.ch/pdf/climate-changes-1995/ipcc-2nd-assessment/2nd-assessment-en.pdf>
- All IPCC Assessment Reports:
http://www.ipcc.ch/publications_and_data/publications_and_data_reports.shtml#1

Appendix 2: Waste Definitions

Waste Types

Waste Type	Definition
Hazardous	As defined by national legislation at the point of generation
Non-Hazardous	All other forms of solid or liquid waste, excluding wastewater

Waste disposal method

Disposal Method	Definition
Composting	Organic waste undergoing decomposition process to become new soil
Reuse	Using things again without changing the object's character. Example: reuse of empty bottles
Recycling	Using materials from waste as raw materials to produce new products or resources
Recovery	Be used if waste is incinerated and recycled for energy purposes
Incineration	Be used if waste are incinerated and converted into ashes. Not used for Energy purposes
Landfilled	To be used if waste are stored in landfills and cannot be reused, recycled material or energy recovered.
Deep well injection	Used for waste e.g. pumped down several thousand meters deep into porous rocks, well below drinking water sources. Examples: storage of oily water, radioactive water, or producing water with chemicals.
On-site storage	Used for waste stored at the company property
Other	Applied when other than the above disposal methods are used.

Appendix 3: Nutrient Emissions to Water Calculations

Under development – not yet public

Appendix 4 Mass Balance and Book and Claim Accounting Principles

Under development – not yet public